

Scianni, Melissa

From: Ziegler, Sam
Sent: Thursday, April 10, 2014 12:16 PM
To: Brush, Jason
Subject: Re: Wetlands Section Weekly Report

As appropriate keep us in the loop, especially Luisa. But just as appropriate. Thanks. Sam
Sam Ziegler
415-972-3399
ziegler.sam@epa.gov

From: Brush, Jason
Sent: Thursday, April 10, 2014 12:11:20 PM
To: Ziegler, Sam
Subject: RE: Wetlands Section Weekly Report

Thanks. I'll know more next week. Just updated hq and talking with Jane at 1. Contemplating giving Goldzband a call, mostly as heads up but perhaps some strategizing, but not until next week. I'm off tomorrow and Mon.

From: Ziegler, Sam
Sent: Thursday, April 10, 2014 11:36 AM
To: Brush, Jason
Subject: Re: Wetlands Section Weekly Report

This is bad. Please let us know if we can help at all. SZ
Sam Ziegler
415-972-3399
ziegler.sam@epa.gov

From: Brush, Jason
Sent: Thursday, April 10, 2014 11:09:42 AM
To: R9_WTR_MANAGERS; Johnson, AudreyL
Cc: Moore, Linda
Subject: Wetlands Section Weekly Report

CWA Jurisdiction over South Bay Salt Ponds: Effectively reversing the Corps San Francisco District's position, Corps HQ has issued legal guidance asserting no CWA jurisdiction at the Cargill Redwood City salt ponds, and seeking immediate finalization of the SF District's WUS determination. The memo treats the site as upland on the basis that the "liquids" present are an industrial byproduct (EPA effluent guidelines and standards §415(p)) rather than "water." Over the next several days, WTR Div will consult with OW and ORC about EPA's options, particularly given the memo's reliance EPA regulations for the position. (Scianni, 2-3821)